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September 27, 2022


**VIA ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Under Rule 13(a)(2) of the Rules for the Division of Business Among District Judges, S.D.N.Y., "[c]ivil cases shall not be deemed related merely because they involve common legal issues or the same parties." That is precisely the request here. Also, pursuant to Rule 13(a)(1), the interests of justice and efficiency would not be served by deeming this case related to 20-cv-08837, as the cases do not appear to have substantial factual overlap, and are at very different stages of litigation. Accordingly, Plaintiff's request is DENIED.

SO ORDERED

Dated: September 28, 2022  
New York, New York

  
JENNIFER L. ROCHON  
United States District Judge

Re: Kristina Stewart Ward v. Cohen Media Publications LLC, Cohen Media Group LLC, and Cohen Brothers Realty Corporation; 22-cv-06431 (ER) (KHP)

Dear Judge Rochon:

We represent the Plaintiff, Kristina Stewart Ward. We write to request that this case be reassigned to Judge Gregory H. Woods since he has been handling the related case Corinne Arazi, Roseann Hylemon, and Evelyn Julia v. Cohen Brothers Realty Corporation, 20-cv-08837 (GHW) (SDA).

Attached as Exhibit 1 is the Related Case Statement filed in this action. Since the Related Case Statement was filed a few days after the Complaint was filed, the Clerk's Office had already assigned this case to Judge Edgardo Ramos. It has now been reassigned to Your Honor. After not seeing a response from the Clerk's Office to the Related Case Statement, I called the Clerk's Office and was told that since the case had already been assigned to a judge I needed to address the request for reassignment to the judge.

Attached as Exhibit 2 is the Complaint from this case. Attached as Exhibit 3 is the Third Amended Complaint from the Arazi case. Attached as Exhibit 4 is Judge Woods' decision denying Defendants' partial motion to dismiss in the Arazi case.

Counsel for Defendants has indicated to me that Defendants object to this request for reassignment.

The Honorable Jennifer L. Rochon

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September 27, 2022

Respectfully submitted,

S/ Michael E. Grenert

Michael E. Grenert  
Counsel for Plaintiff

cc: Ivan D. Smith, Esq. (via ECF)  
Andrea M. Paparella, Esq. (via ECF)